

EXCERPTS FROM THE DEPOSITION OF  
ROBYN DENHOLM  
TAKEN OCTOBER 5, 2021

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TESLA, INC. ) CIVIL ACTION NO:  
SECURITIES LITIGATION ) 3:18-cv-04865-EMC

-----  
VIDEOTAPED AND REMOTE ORAL DEPOSITION OF  
ROBYN DENHOLM  
OCTOBER 5, 2021  
-----

VIDEOTAPED AND REMOTE ORAL DEPOSITION OF ROBYN  
DENHOLM, produced as a witness at the instance of the  
PLAINTIFFS, and duly sworn, was taken in the above-styled  
and numbered cause on the 5th day of October, 2021, from  
10:51 a.m. to 3:21 p.m., before Kathryn R. Baker, CSR,  
RPR, in and for the State of Texas, reported by machine  
shorthand in the City of Austin, State of Texas, pursuant  
to the Federal Rules of Civil Procedure.

REPORTED BY KATHRYN R. BAKER, RPR, CSR  
JOB #200188

A P P E A R A N C E S

FOR THE PLAINTIFFS:

By: Elizabeth Tripodi, Esq.

Kathy Ames Valdivieso, Esq.

LEVI & KORSINSKY

1101 30th Street NW

Washington, DC 20007

FOR TESLA:

By: Patrick Gibbs, Esq.

Joshua Walden, Esq.

COOLEY

3175 Hanover Street

Palo Alto, California 94304

ALSO PRESENT:

Mr. Marshall Fox, Videographer

Ms. Candice Jackman, in-house counsel, Tesla

## P R O C E E D I N G S

THE VIDEOGRAPHER: We're now on the record.  
The time is 10:51.

This is the remote videotaped deposition of Robyn Denholm on October 5th, 2021, in case, In Re: Tesla, Inc., Securities Litigation, in the United States District Court, Northern District of California, San Francisco Division.

This deposition is being held remotely over Zoom. My name is Marshall Fox. I am the certified legal video specialist with TSG Reporting. The court reporter today is Kathryn Baker, also in association with TSG Reporting.

Due to the ongoing COVID-19 precautions, all parties are participating remotely. I will not be in the same room with the witness. Instead, I will record this videotaped deposition remotely. The reporter also will not be in the same room and will swear the witness remotely.

If counsel could please state their appearance for the record and stipulate to the validity of this remote recording and remote swearing.

MS. TRIPODI: Good morning. Elizabeth Tripodi of Levi & Korsinsky, LLP, on behalf of the plaintiff. With me today is my colleague, Kathy Ames,

1 also of Levi & Korsinsky.

2 And plaintiffs stipulate to the validity.

3 MR. GIBBS: Good morning. This is Patrick  
4 Gibbs from Cooley on behalf of the defendants in the case,  
5 including Ms. Denholm. Also with me today are Josh  
6 Walden, also from Cooley, and Candice Jackman, in-house  
7 counsel from Tesla.

8 We also stipulate to the remote deposition  
9 proceeding.

10 THE VIDEOGRAPHER: Thank you very much.

11 If the court reporter will please swear in  
12 the witness.

13 ROBYN DENHOLM,  
14 having been first duly sworn, testified as follows:

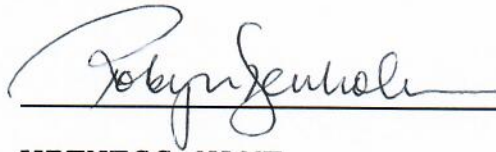
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

DEPOSITION TESTIMONY  
FILED UNDER SEAL

ERRATA  
FILED UNDER SEAL

## ACKNOWLEDGMENT OF DEPONENT

I, Robyn Jenholm, do hereby certify that I have read the foregoing pages, and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form and substance, if any, noted on the attached Errata.



WITNESS NAME



DATE



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TESLA, INC. ) CIVIL ACTION NO:  
SECURITIES LITIGATION ) 3:18-cv-04865-EMC

\*\*\*\*\*

REPORTER'S CERTIFICATION  
ORAL DEPOSITION OF ROBYN DENHOLM

OCTOBER 5, 2021

(CONDUCTED REMOTELY VIA ZOOM)

\*\*\*\*\*

I, Kathryn R. Baker, RPR, a Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, ROBYN DENHOLM, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

I further certify that pursuant to FRCP Rule 30(f)(1) that the signature of the deponent:

  X   was requested by the deponent or a party before the completion of the deposition and is to be returned within 30 days from the date of receipt of the transcript. If returned, the attached Errata contain any

1 changes and the reasons therefor;

2 \_\_\_\_\_ was not requested by the deponent or a party  
3 before the completion of the deposition.

4 I further certify that I am neither counsel for,  
5 related to, nor employed by any of the parties or  
6 attorneys in the action in which this proceeding was  
7 taken, and further that I am not financially or otherwise  
8 interested in the outcome of the action;

9 Subscribed and sworn to on this 16th day of  
10 October, 2021.

11 

12 KATHRYN R. BAKER, RPR, CSR #6955  
13 Expiration Date: 04/30/2023  
14 Firm Registration No. 615  
15 TSG Reporting  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25